

EXHIBIT A



Jessica Mariani <jessica.mariani@lacity.org>

Matthews motion to reconsider/ motion for leave to amend

1 message

William Claiborne <claibornelaw@gmail.com>

Sun, Nov 5, 2023 at 11:38 PM

To: Arlene Hoang <arlene.hoang@lacity.org>, Jessica Mariani <jessica.mariani@lacity.org>, Jovan Blacknell <jovan@fight4justice.com>

Hello Arlene & Jessica

Plaintiffs file a motion to reconsider and a motion for leave to amend the complaint

Local Rule 7.3 provides in part:

L.R. 7-3 Conference of Counsel Prior to Filing of Motions. In all cases not listed as exempt in L.R. 16-12, and except in connection with discovery motions (which are governed by L.R. 37-1 through 37-4) and applications under F.R.Civ.P. 65 for temporary restraining orders or preliminary injunctions, counsel contemplating the filing of any motion must first contact opposing counsel to discuss thoroughly, preferably in person, the substance of the contemplated motion and any potential resolution. The conference must take place at least 7 days prior to the filing of the motion.

Do you have time this week after 3 pm LA time to discuss thoroughly the substance of the contemplated motion and any potential resolution

Plaintiffs want to amend the complaint to correct the allegations about how the Chief handled CCWs during the class period based on Officer Penson's testimony, add some allegations about the number of putative class members, some allegations about Mr Hearn and his jobs and background, and some other allegations we can discuss if you like thanks

Chaz

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